

Company:	Arkansas Blue Cross and Blue Shield
Product Name:	2021 SG BC Off Exchange Rates
State:	Arkansas
TOI:	H16G Group Health - Major Medical
Sub-TOI:	H16G.003B Small Group Only - PPO Basic
Filing Type:	Rate
Date Submitted:	07/20/2020
SERFF Tr Num:	ARBB-132460151
SERFF Status:	Pending State Action
State Tr Num:	ACA OFF EXCHANGE ONLY
State Status:	Waiting Industry Response
Co Tr Num:	2021 BC SG OFF EXCHANGE RATES
Implementation	01/01/2021
Date Requested:	
Author(s):	Christi Kittler, Yvonne McNaughton, Sammytra Williams, Angie Dover, Katrina Higgins, Melissa Bradshaw, Zane Chrisman
Reviewer(s):	Donna Lambert (primary), David Dillon, Brian Stentz
Disposition Date:	
Disposition Status:	
Implementation Date:	
State Filing Description:	

**State:** Arkansas    **Filing Company:** Arkansas Blue Cross and Blue Shield  
**TOI/Sub-TOI:** H16G Group Health - Major Medical/H16G.003B Small Group Only - PPO Basic  
**Product Name:** 2021 SG BC Off Exchange Rates  
**Project Name/Number:** 2021 SG BC Off Exchange Rates/17-321, 17-322, 17-323, 17-324, 17-325, 17-327, 17-328

## General Information

Project Name: 2021 SG BC Off Exchange Rates    Status of Filing in Domicile: Pending  
Project Number: 17-321, 17-322, 17-323, 17-324, 17-325, 17-327, 17-328    Date Approved in Domicile:  
Requested Filing Mode: Informational    Domicile Status Comments: Arkansas is our state of domicile.  
Explanation for Combination/Other:    Market Type: Group  
Submission Type: New Submission    Group Market Size: Small  
Group Market Type: Employer    Overall Rate Impact: -1.77%  
Filing Status Changed: 07/21/2020  
State Status Changed: 07/20/2020    Deemer Date: 08/19/2020  
Created By: Sammytra Williams    Submitted By: Sammytra Williams  
Corresponding Filing Tracking Number:  
  
PPACA: Non-Grandfathered Immed Mkt Reforms  
  
PPACA Notes: null  
Include Exchange Intentions: No

### Filing Description:

The purpose of this filing is to submit our small group metallic PPO 2021 initial rates for informational purposes. The SERFF Tracking number for the last rate revision of group rates is ARBB-132422237. The 2021 Plan Year Binder associated with this rate filing is ARBB-AR21-125098855.

## Company and Contact

### Filing Contact Information

Sammytra Williams, Regulatory Compliance SLWilliams@arkbluecross.com  
Analyst  
320 West Capitol, Suite 211    501-378-3736 [Phone]  
Little Rock, AR 72201

### Filing Company Information

Arkansas Blue Cross and Blue Shield	CoCode: 83470	State of Domicile: Arkansas
601 S. Gaines Street	Group Code:	Company Type:
Little Rock, AR 72201	Group Name:	State ID Number:
(501) 378-2967 ext. [Phone]	FEIN Number: 71-0226428	

## Filing Fees

Fee Required?	Yes
Fee Amount:	\$50.00
Retaliatory?	No
Fee Explanation:	\$50.00 per form
Per Company:	No

**State:** Arkansas    **Filing Company:** Arkansas Blue Cross and Blue Shield  
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Company	Amount	Date Processed	Transaction #
Arkansas Blue Cross and Blue Shield	\$50.00	07/20/2020	181046940

## State Specific

All major medical rate filings must have the "Overall Rate Impact" field on the General Information tab populated with the average rate adjustment requested.: Yes

If rate filing, please provide the SERFF Tracking # of last rate revision REQUEST filed regardless of Disposition.: ARBB-132422237

Is this product intended to be a QHP or SADP sold ON the Marketplace?: No

Is this a medical product intended to be sold ONLY OFF the Marketplace?: Yes

Is this a dental product intended to be a stand-alone, CERTIFIED dental plan offered OFF the Marketplace to supplement a minimum essential health benefit plan offered on or off the Marketplace?: No

Is this filing submitted to recertify or revise a plan previously certified for use as a QHP, an SADP, or dental product certified to supplement the pediatric benefit of a minimum essential health benefit plan offered on or off the Marketplace? If so, please provide the SERFF Tracking # of the previously approved filing or filings.: N/A

Is this filing for a non-EHB compliant "transitional" major medical product which can be extended until December 31, 2020?

See CMS Bulletin titled "Insurance Standards. Bulletin Series - INFORMATION - Extension of Limited Non-Enforcement Policy through 2020" dated March 25, 2019.: No

<b>State:</b>	Arkansas	<b>Filing Company:</b>	Arkansas Blue Cross and Blue Shield
<b>TOI/Sub-TOI:</b>	H16G Group Health - Major Medical/H16G.003B Small Group Only - PPO Basic		
<b>Product Name:</b>	2021 SG BC Off Exchange Rates		
<b>Project Name/Number:</b>	2021 SG BC Off Exchange Rates/17-321, 17-322, 17-323, 17-324, 17-325, 17-327, 17-328		

## Rate Information

Rate data applies to filing.

<b>Filing Method:</b>	SERFF
<b>Rate Change Type:</b>	Increase
<b>Overall Percentage of Last Rate Revision:</b>	0.330%
<b>Effective Date of Last Rate Revision:</b>	10/01/2020
<b>Filing Method of Last Filing:</b>	Informational
<b>SERFF Tracking Number of Last Filing:</b>	ARBB-132422237

## Company Rate Information

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Arkansas Blue Cross and Blue Shield	Increase	-1.770%	-1.770%	\$2,100,412	1,498	\$116,566,969	5.190%	-6.870%

State: Arkansas Filing Company: Arkansas Blue Cross and Blue Shield  
TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003B Small Group Only - PPO Basic  
Product Name: 2021 SG BC Off Exchange Rates  
Project Name/Number: 2021 SG BC Off Exchange Rates/17-321, 17-322, 17-323, 17-324, 17-325, 17-327, 17-328

## Rate Review Detail

### COMPANY:

Company Name: Arkansas Blue Cross and Blue Shield  
HHS Issuer Id: 75293

### PRODUCTS:

Product Name	HIOS Product ID	HIOS Submission ID	Number of Covered Lives
BC SG Off Exchange PPO	75293AR122	75293-1798582142352132100	20724

Trend Factors: These differ by category but are proprietary

### FORMS:

New Policy Forms: None  
Affected Forms:  
Other Affected Forms: 17-321, 17-322, 17-323, 17-324, 17-325, 17-327, 17-328

### REQUESTED RATE CHANGE INFORMATION:

Change Period: Annual  
Member Months: 270,063  
Benefit Change: None  
Percent Change Requested: Min: -6.87 Max: 5.19 Avg: -1.77

### PRIOR RATE:

Total Earned Premium: 118,667,381.00  
Total Incurred Claims: 94,221,901.00  
Annual \$: Min: 137.92 Max: 1,214.97 Avg: 439.41

### REQUESTED RATE:

Projected Earned Premium: 116,566,969.00  
Projected Incurred Claims: 98,656,135.00  
Annual \$: Min: 128.78 Max: 1,254.62 Avg: 431.63

## Rate Filing Justification Part II (Plain Language Summary)

Pursuant to 45 CFR 154.215, health insurance issuers are required to file Rate Filing Justifications. Part II of the Rate Filing Justification for rate increases and new submissions must contain a written description that includes a simple and brief narrative describing the data and assumptions that were used to develop the proposed rates. The Part II template below must be filled out and uploaded as an Adobe PDF file under the Consumer Disclosure Form section of the Supporting Documentation tab.

---

Name of Company      Arkansas Blue Cross and Blue Shield, Inc.

SERFF tracking number    ARBB-132460151

Submission Date      7/20/20

Product Name      Small Group PPO

Market Type      ☐ Individual      ☒ Small Group

Rate Filing Type      ☒ Rate Increase      ☐ New Filing

### Scope and Range of the Increase:

The -1.77 % increase is requested because:

This request is based in large part on a reduction in margin for the 2021 plan year, as well as the removal of the Health Insurers Tax. The request is also informed by benefit changes, utilization and cost trends, demographics, morbidity, and expenses. The -1.77% request helps ensure ABCBS's small group product is adequately and competitively priced for the 2021 plan year.

This filing will impact:

# of Arkansas policyholder's    1498      # of Arkansas covered lives    20724

The average, minimum and maximum rate changes increases are:

- Average Rate Change: The average premium change, by percentage, across all policy holders if the filing is approved -1.77 %
- Minimum Rate Change: The smallest premium increase (or largest decrease), by percentage, that any one policy holder would experience if the filing is approved -6.87 %
- Maximum Rate Change: The largest premium increase, by percentage, that any one policy holder would experience if the filing is approved 5.19 %

Individuals within the group may vary from the aggregate of the above increase components as a result of:

Rate increases may vary by plan due to changes in benefit changes relative to their 2020 benchmarks. Some plans have significant rate decreases for the 2021 plan year, while others have moderate increases.

### Financial Experience of Product

The overall financial experience of the product includes:

The overall financial experience of this product is based on claims experience incurred in calendar year 2019 and paid as of 5/31/2020, with an additional estimate for claims incurred but not paid (IBNP).

The rate increase will affect the projected financial experience of the product by:

The 2021 requested rate decrease will allow ABCBS to provide competitively priced premiums that adequately cover the financial risks associated with this type of product, as well as allowing ABCBS to meet the federally mandated Minimum Loss Ratio (MLR) requirement (based on ABCBS's financial projections).

### **Components of Increase**

The request is made up of the following components:

*Trend Increases* – 4.53 % of the -1.77 % total filed increase

1. Medical Utilization Changes – Defined as the increase in total plan claim costs not attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts. Examples include changes in the mix of services utilized, or an increase/decrease in the frequency of service utilization.

This component is 0.89 % of the -1.77 % total filed increase.

2. Medical Price Changes – Defined as the increase in total plan claim costs attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts.

This component is 3.64 % of the -1.77 % total filed increase.

*Other Increases* – -6.30 % of the -1.77 % total filed increase

1. Medical Benefit Changes Required by Law – Defined as any new mandated plan benefit changes, as mandated by either State or Federal Regulation.

This component is -1.01 % of the -1.77 % total filed increase.

2. Medical Benefit Changes Not Required by Law – Defined as changes in plan benefit design made by the company, which are not required by either State or Federal Regulation.

This component is -2.98 % of the -1.77 % total filed increase.

3. Changes to Administration Costs – Defined as increases in the costs of providing insurance coverage. Examples include claims payment expenses, distribution costs, taxes, and general business expenses such as rent, salaries, and overhead.

This component is -1.68 % of the -1.77 % total filed increase.

4. Changes to Profit Margin – Defined as increases to company surplus or changes as an additional margin to cover the risk of the company.

This component is -2.44 % of the -1.77 % total filed increase.

5. Other – Defined as:  
Changes in morbidity, risk adjustment, changing demographics and membership mix of the plans

This component is 1.82 % of the -1.77 % total filed increase.

# **Actuarial Memorandum**

USAbLe Mutual Insurance Company

Premium Rate Filing  
for  
Small Group Off-Exchange Health Insurance Products

Effective January 1, 2021

Redacted, Public Version



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## 1. General Information

As required by 45 CFR § 154.215, this Actuarial Memorandum documents the development and justification for Arkansas Blue Cross and Blue Shield's (ABCBS) Affordable Care Act (ACA) Small Group Off-Exchange health insurance premium rates effective January 1, 2021.

The required company identifying information and company contact information can be found below:

### Company Identifying Information

- Company Legal Name: **USAbLe Mutual Insurance Company**
- State: **Arkansas**
- HIOS Issuer ID: **75293**
- Market: **Small Group**
- Effective Date: **1/1/2021**

### Company Contact Information

- Primary Contact Name: -----
- Primary Contact Telephone Number: -----
- Primary Contact E-mail Address: -----

## 2. Proposed Rate Changes

ABCBS is requesting a ----- average rate ----- weighted across all renewing plans, which ranges from ---- to ----. The rating impact by plan ID can be found in the Unified Rate Review Template (URRT), specifically Worksheet 2, Section 1.11.

To review the quantitative impact of significant factors driving the proposed rate change, please refer to the “Relationship of Proposed Rate Scale to Current Rate Scale” exhibit in the “Actuarial Memo Dataset.” This dataset is included with the 2021 rate filing.

The reasons for the requested rating impact include the following:

- Benefit changes required to maintain compliance with the 2021 Federal Actuarial Value Calculator (AVC) and other market considerations.
- Changes in the base period claims experience.
- Updated benefit factors for the 2019 experience period plans and 2021 projection period plans.
- Claims trend from the 2019 experience period to the 2021 projection period.
- Changes in the expected risk adjustment receivable from the 2019 experience period to the 2021 projection period.
- Assumption that the Health Insurance Providers Fee (HIPF) will not be assessed in 2021.
- -----

### 3. Market Experience

This section of the Actuarial Memorandum includes details that support the single risk pool calculations for ABCBS's product in the Arkansas small group market. Such calculations are the basis for the 2021 plan year membership, claims, and premium projections and the requested rating action.

The experience period used for this Actuarial Memorandum is plan year 2019 experience for the single risk pool only. As allowed by the URRT instructions, ABCBS has not included any transitional product/plan experience in this rate filing.

#### 3.1 Experience and Current Period Premium, Claims, and Enrollment

##### A. Paid Through Date

The experience period claims represented in the URRT are claims incurred 1/1/2019 through 12/31/2019 and paid between 1/1/2019 and 5/31/2020. Runout factors have been applied so that the experience period claims reflect an incurred view of the claims.

A summary of the allowed and paid claims can be found below. These are also included in Worksheet 1, Section 1 of the URRT.

- Allowed Claims: -----
- Paid Claims: -----

##### B. Current Date

The membership and premium information in the URRT is current through 5/31/2020. ABCBS is not expecting to pay any small group market rebates for the 2019 experience period.

A summary of the membership (member months) and premium can be found below. These are also included in Worksheet 1, Section 1 of the URRT.

- Member Months: -----
- Premiums: -----

##### C. Allowed and Incurred Claims Incurred During the Experience Period

All medical claims were processed through ABCBS's internal claims processing system and all pharmacy claims were processed through ABCBS's pharmacy benefits manager (PBM), ----- . In order to better identify cost trends from the 2019 experience period to the 2021 projection period, claims have been broken down by claim category. The claim category designations come from -----.

Allowed claims come directly from the claims system.

The IBNP estimate is based on completion factors that were calculated from ABCBS's ACA Small group product paid claims data. -----  
-----  
-----

### 3.2 Benefit Categories

As noted in the previous section, ----- was used to classify experience period claims experience into the URRT benefit categories.

- All inpatient facility claims were mapped to the “Inpatient Hospital” category
- All outpatient facility claims were mapped to the “Outpatient Hospital” category
- PCP, specialist, therapy (OT/PT/ST) and other professional-related claims were mapped to the “Professional” category
- Home health, ambulance, DME, and prosthetics were mapped to the “Other Medical” category
- Provider incentive payments and other capitated payments were mapped to the “Capitation” category
- Prescription drug claims (net of any Rx rebates) were mapped to the “Prescription Drug” category

### 3.3 Projection Factors

This section includes information about the adjustments used to convert 2019 experience period claims to the 2021 projection period.

#### A. Trend Factors (Cost/Utilization)

A trend adjustment was applied to the 2019 experience period claims to account for allowed cost and utilization changes from the 2019 experience period to the 2021 projection period. As demonstrated in Worksheet 1, Section II, ----- . This is also captured in the following exhibit:

*[Exhibit Redacted]*

-----  
-----  
-----  
-----  
-----  
-----

## B. Morbidity Adjustment

---

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---

---

The exhibit below summarizes how the overall morbidity adjustment in the URRT was calculated.

*[Exhibit Redacted]*

## C. Demographic Shift

The demographic shift from the 2019 experience period to the 2021 projection period is expected to be

---

---

---

The exhibit below summarizes how the overall demographic adjustment in the URRT was calculated.

*[Exhibit Redacted]*

#### D. Plan Design Changes

---

#### E. Manual Rate Adjustments

No manual rate was necessary, as the 2019 experience period claims are fully credible.

#### F. Credibility of Experience

Given that the base period experience included -----, the credibility assigned to the base period experience for the purposes of this rate filing is 100%.

#### G. Establishing the Index Rate

The index rate for ABCBS's 2021 Off-Exchange small group rate filing is ----- . This is demonstrated in the exhibit below.

Please note that any PMPM differences between the exhibit below and the URRT is due to rounding limitations in the URRT.

*[Exhibit Redacted]*

The index rate is scheduled to -----.

#### H. Development of Market-Wide Adjusted Index Rate (MAIR)

The development of the 2021 projection period MAIR can be viewed in the exhibit below. Additional information regarding risk adjustment and exchange user fee modifiers can also be found in this section.

Please note that any PMPM differences between the exhibit below and the URRT is due to rounding limitations in the URRT.



[Exhibit Redacted]

(1) Reinsurance

-----

(2) Risk Adjustment Payment/Charge

The expected risk adjustment transfer can be found in Worksheet 1, Section II of the URRT.

-----  
-----  
-----

The basis for this calculation was -----risk adjustment information from the following sources:

- -----
  - -----  
-----
- -----
  - -----  
-----
  - -----
- -----
  - -----  
-----

When estimating the risk adjustment transfer for the 2021 projection period, key variables in the risk adjustment transfer were estimated and applied against the Federal risk adjustment transfer formula. These variables include the following:

- -----
  - -----
  - -----
- -----
  - -----
  - -----
- -----
  - -----
    - -----
    - -----
- -----
  - -----
  - -----

Other variables used in the risk adjustment transfer formula were carried over from 2019 into 2021 with -----  
----- . These factors include the following:

- -----
- -----
- -----

Finally, the HCRP was estimated by -----  
-----

The expected HCRP PMPM -----  
-----  
-----

The following exhibit below demonstrates how the risk adjustment payment was calculated. This is being presented on a paid basis.

[Exhibit Redacted]

### (3) Exchange User Fees

The small group plans are only being offered off-exchange, so no user fees are assumed.

### 3.4 Plan Adjusted Index Rate

The plan adjusted index rate (PAIR) was calculated by applying all allowable adjustments to the MAIR as outlined in the 2021 URRT instructions. All factors outlined below can be found in Worksheet 2, Section III of the URRT.

#### A. Actuarial Value (AV) and Cost-Sharing Design Adjustment

The weighted average AV and cost-sharing design factor for the 2021 projection period is -----.

Benefit factors to adjust 2019 experience period claims to the 2021 projection period were developed using -----

Plan benefits were changed in order to maintain compliance with the 2021 Federal AV Calculator. Some plan benefits were also changed to ensure plan benefits and premiums were in line with ABCBS's perceived market expectations.

#### B. Changes to Network, Delivery System, and Utilization Management Practices

The factor for changes to network, delivery system, and UM practices is -----

#### C. Benefits in Addition to EHB Benefits

The weighted average factor for benefits covered in addition to EHB benefits is -----

The non-EHB benefits included in the "Benefits in Addition to EHB" factor are as follows:

- Treatment of craniofacial anomaly
  - Coverage of craniofacial anomaly is a state mandated benefit adopted after December 31, 2011 by the State of Arkansas.
- Adult vision exams
- Newborn screening

#### **D. Administrative Costs**

The following administrative costs include all expenses other than EUF and reinsurance fees, which have already been factored into the MAIR.

##### **(1) Administrative Expense**

The weighted average factor for administrative expenses is ----- . Administrative expense assumptions were developed using -----  
-----

##### **(2) Taxes and Fees**

The weighted average factor for taxes and fees in the projection period is ----- . This percentage includes the following:

- -----
- -----
- -----
- -----

##### **(3) Profit and Risk Load**

The weighted profit and risk load for the projection period is ----- . -----  
-----.

-----  
-----

#### **E. Development of Plan Adjusted Index Rate**

The exhibits below demonstrate how the plan adjusted index rate was developed for each plan ID being offered in 2021. This includes an exhibit that ties the administrative expenses, taxes and fees, and profit and risk loads for each Plan ID to Worksheet 2, Section III of the URRT.

Please note that any PMPM differences between the exhibits below and the URRT is due to rounding limitations in the URRT.

*[Exhibit Redacted]*

*[Exhibit Redacted]*

### 3.5 Calibration

The following calibrations are used to make the PAIR calibrated to a 1.00 factor. All of the calibration factors can be found in Worksheet 2, Section III of the URRT.

#### A. Age Curve Calibration

The age calibration factor for the 2021 projection period is -----. This was found using the most recent Federal age curve and applying it to the 2021 projection period enrollment by age, which resulted in an average age curve factor of -----.

The age curve calibration factor is used to help calibrate the PAIR to a normalized value, which can then be applied to consumer-level adjustments. The age curve is one of three factors used to normalize (see sections B and C below). Once the PAIR is normalized to the calibrated PAIR and ready to be priced at the consumer-level, ABCBS will apply the appropriate age factor based on a consumer's age per the Federal age curve (see Appendix A).

#### **B. Geographic Factor Calibration**

The geographic calibration factor for the 2021 projection period is ----- based on -----  
-----

#### **C. Tobacco Use Rating Factor Calibration**

The calibration factor is 1.000 as tobacco use will not be rated for.

#### **D. Combined Calibration Factors**

The combined calibration factors used in the 2021 rate filing is ----- . It is used uniformly for all plans in the single risk pool. The exhibit below demonstrates how the calibrated plan adjusted index rate is calculated, using the plan adjusted index rate and calibration factors.

Please note that any PMPM differences between the exhibit below and the URRT is due to rounding limitations in the URRT.

*[Exhibit Redacted]*

### 3.6 Consumer Adjusted Premium Rate Development

The exhibit below shows how to calculate the premium rate for a 35 year-old on the plan 75293AR122000100 (Platinum 250 Elite). The exhibit starts with the PAIR, applies the calibration factors from Section 3.5 of this memorandum, and then applies the appropriate consumer-level adjustments based on the consumer's age and rating area.

Please note that any PMPM differences between the exhibit below and the URRT is due to rounding limitations in the URRT.

*[Exhibit Redacted]*



#### 4. Projected Loss Ratio

The projected loss ratio for the 2021 projection period was calculated based on the federally prescribed MLR methodology, including non-ACA small group business in the MLR filing. In addition to the 2021 projection period, 2019 and 2020 MLR projections have been provided in order to calculate the three-year average MLR for the 2021 projection period. This can be found in the exhibit below.

*[Exhibit Redacted]*

## 5. Plan Product Information

### 5.1 AV Metal Value

All plan AV metal values were based on the Federal AV Calculator methodology and tool. These values by plan can be found in Worksheet 2, Section I of the URRT.

### 5.2 Membership Projections

The membership projections used for the 2021 projection -----  
-----

- -----
- -----

### 5.3 Terminated Plans and Products

The exhibit below includes a list of terminated plans for plan years 2019 and 2021.

*[Exhibit Redacted]*

### 5.4 Plan Type

All plans in Worksheet 2, Section 1 of the URRT were described accurately by the available drop-down box in this section of the URRT.

## 6. Miscellaneous

### 6.1 Effective Rate Review Information

As this section is optional, ABCBS has elected not to provide additional information requested in this section.

## 6.2 Actuarial Certification

I, -----, am a Fellow in the Society of Actuaries (FSA) and a member of the American Academy of Actuaries. I meet the Qualification Standards of Actuarial Opinions as adopted by the American Academy of Actuaries, and have the education and experience necessary to complete this rate filing for USABLE Mutual Insurance Corporation (ABCBS). I am employed by ABCBS as -----.

I certify the rates in this filing were developed in accordance with the appropriate Actuarial Standards of Practice (ASOPs) and the profession's Code of Professional Conduct. While other ASOPs apply, particular emphasis was placed on the following:

- ASOP No. 5, *Incurred Health and Disability Claims*
- ASOP No. 8, *Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health Benefits*
- ASOP No. 12, *Risk Classification*
- ASOP No. 23, *Data Quality*
- ASOP No. 25, *Credibility Procedures*
- ASOP No. 26, *Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans*
- ASOP No. 41, *Actuarial Communications*
- ASOP No. 42, *Health and Disability Actuarial Assets and Liabilities Other Than Liabilities for Incurred Claims*
- ASOP No. 45, *The Use of Health Status Based Risk Adjustment Methodologies*
- ASOP No. 50, *Determining Minimum Value and Actuarial Value under the Affordable Care Act*

I certify that to the best of my knowledge and judgment:

1. The projected Index Rate is:
  - In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80 and 147.102)
  - Developed in compliance with the applicable Actuarial Standards of Practice
  - Reasonable in relation to the benefits provided and the population anticipated to be covered
  - Neither excessive nor deficient
2. The Index Rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan-level rates.
3. The geographic rating factors reflect only differences in the costs of delivery (which can include unit cost and provider practice pattern differences) and do not include differences for population morbidity by geographic area.
4. The AV Calculator was used to determine the AV Metal Values shown in Part I of Worksheet 2 in the URRT for all plans.

The URRT does not demonstrate the process used by the issuer to develop the rates. Rather, it represents information required by federal regulation to be provided in support of the review of rate increases, for certification of Qualified Health Plans for Federally-facilitated Exchanges, and for certification that the Index Rate is developed in accordance with federal regulation and used consistently and only adjusted by the allowable modifiers.

The 2021 plan year premium rates in this Actuarial Memorandum are contingent upon the status of the ACA statutes and regulations, including any regulatory guidance, court decisions, or otherwise at the Federal and State levels. Changes have the potential to greatly impact the 2021 plan year premium rates provided in this Actuarial Memorandum. Changes include, but are not limited to, any legislative or regulatory amendments, court decisions, or decisions by Congress, the Health and Human Services Secretary or the Centers for Medicare and Medicaid Services director.

\_\_\_\_\_  
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## Appendix A

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*[Exhibit Redacted]*